

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

PATTY RATERMANN,

Plaintiff,

v.

QUICKFRAME, INC.

Defendant

Case No.:1:22-CV-325-JMF

**DEFENDANT QUICKFRAME INC.'S RULE 68 OFFER OF JUDGMENT TO
PLAINTIFF PATTY RATERMANN**

Pursuant to Rule 68 of the Federal Rules of Civil Procedure, Defendant QuickFrame, Inc. ("QuickFrame") hereby offers that judgment be taken by Plaintiff against QuickFrame in this action for all of Plaintiff's claims in the amount of five thousand dollars (\$5,000.00), which is inclusive of all costs and attorneys' fees accrued by Plaintiff to the date of this offer. The judgment shall be in total satisfaction of any and all claims that Plaintiff has, or could have, brought in this action against QuickFrame, including, without limitation, any and all claims for compensatory damages, statutory damages, interest, punitive damages, attorney's fees, and litigation expenses and costs.

Plaintiff is required to serve written notice of acceptance of this offer within fourteen (14) days following service of this offer, absent which this offer shall be deemed rejected. If Plaintiff does not accept this offer and fails to obtain a more favorable judgment, Plaintiff's right to recover costs, including attorneys' fees, may be cut off by this offer, and Plaintiff may be obligated to pay all of QuickFrame's costs and attorneys' fees incurred after the making of this offer. *See* Fed. R. Civ. P. 68(d). If Plaintiff accepts this offer, QuickFrame will file the offer and

notice of acceptance with the Court, and the Clerk of the Court will enter a final judgment in this action in the amount of \$5,000.00, which is inclusive of all attorneys' fees and costs accrued by Plaintiff to the date of this offer.

This offer of judgment is made for the purposes specified in Federal Rule of Civil Procedure 68 and shall not be construed as either an admission that QuickFrame is liable in this action, or that Plaintiff has suffered any damages.

Dated: February 18, 2025

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